



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Ave SE • Bellevue, WA 98008-5452 • 425-649-7000  
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

February 18, 2016

Doug Lansing  
Rainier Commons, LLC  
918 S Horton St, Suite 1018  
Seattle, WA 98134

**RE: Urban Waters Compliance Inspection at Rainier Commons, 3100 Airport Way S,  
Seattle, on November 10, 2015.  
RCRA Site ID: WAD051239994**

Dear Mr. Lansing:

The Department of Ecology (Ecology) inspected the above location to determine compliance with the Dangerous Waste Regulations, Chapter 173-303 WAC.

Ecology has received and reviewed your documentation correcting the item of non-compliance identified in the December 22, 2015 letter and inspection report from Ecology. The compliance issue has been adequately addressed, but you have not submitted a signed Compliance Certificate and you are protesting the validity of the citation.

I appreciate that you have been working with several regulatory agencies to address compliance at the Rainier Commons site for waste disposal, stormwater issues and contaminated paint removal operations.

I understand that prior to my inspection you worked with Rob Reuter, Pollution Prevention Engineer with Ecology's Hazardous Waste and Toxics Reduction Program, to identify sources of contamination to your parking lot sweeping waste. Through that process you spent some time exploring if the source of chromium contamination (D007) had been addressed and eliminated. You supposed that a former tenant specializing in motorcycle repair was likely the source of the contaminant. You then had a total metals test conducted and a toxicity characteristic leaching procedure (TCLP) for lead (because the total metals test showed that the lead exceeded threshold), and since the total metals didn't exceed threshold for chromium, you dropped the chromium waste code from the waste profile for future disposal. After my inspection, I was concerned that the level of metals shown by the total metals test would book designate the sweeping waste as Washington state-only dangerous waste for toxicity. Since no formal book



RCLLC 0012826



Doug Lansing  
February 18, 2016  
Page 2 of 2

Rainier Commons  
RCRA Site ID: WAD051239994  
Inspection Date: November 10, 2015

designation or biological test had been performed on the waste by you, I gave you a violation for incomplete designation.

Through subsequent TCLP, total metals and fish bioassay tests on retained samples of your sweeping waste, you have shown that no Resource Conservation and Recovery Act (RCRA) thresholds have been exceeded for RCRA-8 metals in this waste, and that the waste does not additionally designate for state criteria.

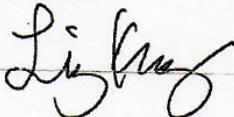
Thank you for being so cooperative and following through with my requirements. In your January 19, 2016 and February 9, 2016 letters, you said that you do not believe the violation was appropriately cited and requested that it be removed from my report and other records. I am within my regulatory authority to issue the violation, as I am to accept your actions and documentation as meeting the requirements of it.

Not correcting areas of non-compliance may result in an escalation of enforcement and the issuance of an administrative order, a penalty (up to \$10,000 per day, per violation), or both, as provided by the Hazardous Waste Management Act (RCW 70.105.080 and/or .095). As you've corrected the item of non-compliance, I am not planning to pursue further enforcement, though this does not relieve you of your continuing responsibility to comply with the regulations at all times.

Thanks for your assistance with this and your diligent attention in reducing sources of pollution to the Duwamish River and Puget Sound.

You may contact me at (425) 649-7143 or [LKUN461@ecy.wa.gov](mailto:LKUN461@ecy.wa.gov) if you have questions or need further information.

Sincerely,



Liz Kunz  
Hazardous Waste Compliance Inspector  
Hazardous Waste and Toxics Reduction Program  
Northwest Regional Office

ecc: Mike Jeffers, Seattle Public Utilities, [Michael.Jeffers@seattle.gov](mailto:Michael.Jeffers@seattle.gov)  
Michelle Mullin, Environmental Protection Agency, [Mullin.Michelle@epa.gov](mailto:Mullin.Michelle@epa.gov)

RCLLC 0012827

From: O'Daniel, Vanessa (ECY) (ECY) <[voda461@ecy.wa.gov](mailto:voda461@ecy.wa.gov)>  
To: [lansinghomes](mailto:lansinghomes@aol.com) <[lansinghomes@aol.com](mailto:lansinghomes@aol.com)>  
Subject: Delinquent 2015 Dangerous Waste Annual Report  
Date: Wed, Mar 16, 2016 11:55 am

Hi Doug,

**You are delinquent in submitting the 2015 Dangerous Waste Annual Report to Department of Ecology for the following site:**

WAD051239994  
RAINIER COMMONS LLC  
3100 AIRPORT WAY S  
SEATTLE, WA 98134

A letter has been sent to the legal owner of the business stating we have not received the 2015 Dangerous Waste Annual Report. The Dangerous Waste Regulations require sites with an active EPA/RCRA Site ID Number to submit an Annual Report. Your report was due on March 1, 2016.

In the next few weeks a list of businesses that haven't submitted their report will be given to our regional inspectors for further investigation. They will determine if they'll conduct an inspection at your location. **Please submit your report by Friday, March 25, 2016.**

If you need assistance give me a call at the phone number below. I can walk you through the process of submitting the report on Turbowaste so your business isn't part of the list.

**Please forward this message to the appropriate person if you are no longer the contact person.**

Thanks,

Vanessa O'Daniel  
Hazardous Waste Planning Fee Administrator  
Hazardous Waste & Toxics Reduction Program  
Email: [voda461@ecy.wa.gov](mailto:voda461@ecy.wa.gov)  
Phone: 360.407.6731

3-16-16 1PM - LEFT MSG ASKING FOR HELP

HELPED  
w/ TURBO WASTE